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6 *Attorney for Plaintiff and all others similarly situated*

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 SHAHROOZ RAHIMIAN, individually
11 and on behalf of all others similarly
12 situated,

13 *Plaintiff,*

14 *v.*

15 RACHEL ADRIANO, and JUAN
16 MARTINEZ, INC.,

17 *Defendants.*

18 Case No. 2:20-cv-02189-GMN-VCF

19 **STIPULATION FOR EXTENSION
20 OF TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS'
MOTION TO DISMISS**

21 **(First Request)**

22 Plaintiff Shahrooz Rahimian and Defendants Rachel Adriano and Juan Martinez, Inc.
23 d/b/a Century 21 Americana hereby stipulate, agree, and move the Court to extend the deadline
24 for Plaintiff to respond to Defendants' motion to dismiss for good cause, in support thereof states
25 as follows:

26 1. On February 16, 2021, Plaintiff filed an amended complaint adding Defendant
27 Juan Martinez, Inc. d/b/a Century 21 Americana to this action.

28 2. Defendants Rachel Adriano and Century 21 Americana's motion to dismiss the
amended complaint was filed on March 11, 2021 (ECF No. 18). Accordingly, Plaintiff's
response is due on March 25, 2021.

3. Plaintiff and Defendant agree that Plaintiff shall have a two week extension of

1 time up to and including April 8, 2021 to file a response to the motion to dismiss. This is the
2 first request for an extension of time to respond to the motion.

3 4. The extension is requested to permit the Plaintiff and counsel sufficient time to
review and appropriately respond to the opposing party's arguments.

5 6. 5. The stipulated extension will not prejudice the parties, nor will it impact other
deadlines in this case.

7 SO STIPULATED.

8 Respectfully submitted,

9 10 Dated: March 25, 2021.

11 /s/ Avi R. Kaufman
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20 21 *Counsel for Plaintiff and all others similarly situated*

22 23 24 25 26 27 28 KAEMPFER CROWELL

Dated: March 25, 2021.

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHAHROOZ RAHIMIAN, individually
and on behalf of all others similarly
situated,

Case No. 2:20-cv-02189-GMN-VCF

Plaintiff,

v.

**[PROPOSED] ORDER GRANTING
STIPULATION FOR EXTENSION
OF TIME**

(First Request)

RACHEL ADRIANO, and JUAN
MARTINEZ, INC.,

Defendants.

On review and consideration of Plaintiff Shahrooz Rahimian and Defendants Rachel Adriano and Juan Martinez, Inc. d/b/a Century 21 Americana stipulation to extend the deadline for Plaintiff to file a response to Defendants' motion to dismiss and the record, the Court finds good cause to extend the response deadline.

The Court GRANTS the parties' stipulation and provides Plaintiff a one week extension of time, up to and including April 8, 2021, within which to file a response to the motion to dismiss.

IT IS SO ORDERED.

Dated this 25 day of March, 2021

Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT